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*NOT ADMITTED IN D.C.

February 19, 2002

Ms. Gloria Blue
Executive Secretary
TPSC
Office of the United States Trade Representative.
600 17th Street, N.W.
Washington, D.C. 20508

**Re: Inv. No. TA-201-73 (Certain Steel Products); Additional Information on
Proposed Exclusions: X-187**

Dear Ms. Blue:

On behalf of the Association of Specialty Cold Rolled Strip Producers of Germany, Austria, and Sweden ("SAGA"), we hereby submit addition information, descriptions and specifications for product exclusions previously made by SAGA in its submissions to the Office of the United States Trade Representative and the United States International Trade Commission. Additional specifications and description information regarding certain exclusion requests previously made by SAGA are contained in Exhibit 1 to this submission.

In addition, SAGA would like to provide additional information with regard to numbers 18 and 19 on SAGA exclusion list, "Steel Rules" and "Rule Die Steel", respectively. According to the manufacturer, both of these products are machined on one side to create a knife-edge and many of these products even have teeth. The "steel rules" at issue are used in the cutting of cartons for the packaging industry. The "rule die steel"

at issue is used in the cutting of textile and leather (e.g. for car seats, shoes ,etc.). Detailed descriptions and specifications for these products were submitted to USTR in SAGA's previous submissions.

According to the manufacturer, while some companies import the steel used in the production of the steel rules and die steel, the "steel rules" and "rule die steel" covered under exclusion requests 18 and 19 are imported as the finished product. While the United States Customs Service has apparently classified these products in HTSUS 7211.90.00.00, a tariff heading covered by this investigation; the manufacturer believes that the correct tariff classification is actually HTSUS 8208.90.60.00, a tariff heading not covered by this investigation. The Customs Service's classification for these products is currently being challenged by one of SAGA's members.

Regardless of the outcome of that case, such products were never intended to be included in the scope of this investigation. In fact, these products may already be outside the written scope of the investigation; SAGA would note that the written description of cold-rolled steel focuses on products with a rectangular cross section and the definition of flat rolled products excludes semi-finished products.

In any event, these finished products are not in competition with any input products produced by the U.S. cold rolled steel industry. The inclusion of such products in any remedy would cause substantial harm to the U.S. purchasers of these products and would not aid the U.S. cold rolled steel industry in its attempt to adjust to import competition. In fact, the inclusion of these products would make any remedy excessive. Additional information on the products covered by exclusion requests 18 and 19 are included in Exhibit 2.

Please do not hesitate to contact us if you have any questions regarding this submission

Respectfully submitted,
BARNES, RICHARDSON & COLBURN

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